

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

TEXAS ASSOCIATION FOR MONEY SERVICES BUSINESSES (TAMSB); HIGH VALUE, INC.; REYNOSA CASA DE CAMBIO, INC.; NYDIA REGALADO d/b/a BEST RATE EXCHANGE; MARIO REGALADO d/b/a BORDER INTERNATIONAL SERVICES; LAREDO INSURANCE SERVICES, LLC; E.MEX. FINANCIAL SERVICES, INC.; R & C, INC. d/b/a TEMEX MONEY EXCHANGE; SAN ISIDRO MULTI SERVICES, INC.; CRIS WIN INC. d/b/a BROWNSVILLE CASA DE CAMBIO; ESPRO INVESTMENT LLC d/b/a LONESTAR MONEY EXCHANGE; and ARNOLDO GONZALEZ, Jr.,

Civil Case No. 5:25-cv-00344-FB

Plaintiffs,

v.

PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES; SCOTT BESENT, SECRETARY OF THE TREASURY; UNITED STATES DEPARTMENT OF THE TREASURY; ANDREA GACKI, DIRECTOR OF THE FINANCIAL CRIMES ENFORCEMENT NETWORK; and FINANCIAL CRIMES ENFORCEMENT NETWORK,

Defendants.

JOINT SCHEDULING RECOMMENDATION

Pursuant to the Court's Order of June 11, 2025, the parties recommend that the following deadlines be entered in the scheduling order to control the course of this case:

1. The parties have conferred and jointly request that they be excused from the obligation to complete ADR under Local Rule CV-88. Plaintiffs in this case challenge the

lawfulness of an agency action that applies to money services businesses across thirty zip codes, and, in response, Defendants maintain that the challenged agency action is lawful. These claims are not susceptible to voluntary resolution. The parties request that no deadline for ADR be set.

2. For the same reason, the parties do not think that written offers of settlement would be helpful and ask the Court not to set any deadline for such offers.

3. The parties do not anticipate any further amendments to the pleadings. To the extent that a deadline is required, the parties suggest that any motion to amend or supplement the pleadings should be due by August 6, 2025.

4. Because this case is a challenge to agency action under the Administrative Procedure Act, the parties do not anticipate calling any experts. The parties do not believe deadlines for expert disclosure are necessary for this litigation.

5. For the same reason, the parties do not think it is necessary to set a deadline for objections to expert testimony.

6. Because this case is a challenge to agency action under the Administrative Procedure Act, the parties believe that it should be decided on the basis of the administrative record without any need for discovery.¹ The parties therefore do not believe that it is necessary to set a deadline for the close of discovery.

7. Defendants have moved to stay this litigation pending the appeal from the preliminary injunction, and Plaintiffs oppose the motion to stay. To the extent that the litigation is not stayed, the parties jointly suggest the following schedule for dispositive motions:

¹ The parties disagree about what materials are properly within the administrative record. Plaintiffs moved to supplement the administrative record, *see* Doc. 50, and the Court granted that motion, *see* Doc. 54. Defendants preserve their objection to the motion to supplement the record and intend to argue that supplementation is unwarranted at summary judgment as well. Plaintiffs continue to maintain that the motion was properly granted.

August 6	Plaintiffs' Motion for Summary Judgment
September 12	Defendants' Response and Cross-MSJ/MTD
October 13	Plaintiffs' Response and Reply
November 3	Defendants' Reply

The parties further agree that there is no need for an answer at this stage, given Defendants' intention to file a Motion to Dismiss or for Summary Judgment, and propose that regardless of whether this matter is stayed, any obligation to answer the Complaint be held in abeyance at this time.

8. Because this case is a challenge to agency action under the Administrative Procedure Act, the parties believe that it is appropriately decided on the basis of the administrative record on cross-motions for summary judgment. *See, e.g., Amin v. Mayorkas*, 24 F.4th 383, 391 (5th Cir. 2022). The parties therefore do not believe that it is necessary to set a deadline for trial. However, the parties do believe it would be appropriate to set a hearing date for oral argument after briefing is concluded.

9. All of the parties who have appeared in the action conferred concerning the contents of the proposed scheduling order on July 9, 2025, and the parties have agreed as to its contents.

Dated: July 11, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on July 11, 2025, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will provide electronic service upon all attorneys of record.

/s/ Robert E. Johnson